

Connect America Phase II Challenge Process Form
OMB Control Number 3060-1188
FCC Form 505

Filing Entity: Mark Twain Communications Company

FRN (if applicable): 0002531879

Name of Person Filling Out Form: Derek Fast

Mailing Address of Person Filling Out Form: 48054 St Highway 6, Hurdland, MO 63547

Email Address of Person Filling Out Form: dfast@marktwain.coop

Phone Number of Person Filling Out Form: 660-423-6822

Name of Person Certifying Data within Form: Jim Lyon

Mailing Address of Person Certifying Data within Form: 48054 St Highway 6, Hurdland, MO 63547

Email Address of Person Certifying Data within Form: gm@marktwain.coop

Phone Number of Person Certifying Data within Form: 660-423-6822

Certifications and Additional Information

OMB Control Number 3060-1188

Accuracy and Due Diligence Certification

All Filers Must Fill Out

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials: JL

Date: 11/7/2014

Notice of Challenge Certification

(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)

Service of Notice Successful

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials:

Date:

Service of Notice Unsuccessful

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties

that Could Not Be

Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

Contest Block ID	Flight First Code	State	Name of Entry Making Initial Challenge	PNY of Entry Making Initial Challenge (if provided)	Insert X if Spoof	Allowance Criteria is at Issue	Insert X if Lateral	Insert X if Voice	Type of Supporting Evidence	Additional Comments	
29111970200100	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200101	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200104	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200106	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200109	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200114	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200117	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200137	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200142	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200144	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200151	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200154	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200166	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200167	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200171	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200181	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200188	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200192	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200195	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200197	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200199	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200201	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200203	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200208	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200209	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200213	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200218	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200233	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200238	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200244	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200251	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200255	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200305	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200310	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200312	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200315	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200316	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200317	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200318	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200319	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200320	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200325	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		
29111970200335	MO	MO	Centurylink	NA	X	X	X	X	Cover letter, Exhibit 1, Exhibit 2, Exhibit 3		

OMG Contest Number 3066-10



November 7, 2014

VIA ECFS

Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attn: Ryan Yates, Esq.; Telecommunications Access Policy Division,
Wireline Competition Bureau

Re: WC Docket No 14-93
Connect America Fund Phase II Challenge

Dear Mr. Yates:

Mark Twain Communications Company (MTCC) is responding to the challenge of census blocks on the attached FCC Form 505 from CenturyLink that states such census blocks should not be showing up as served because MTCC does not offer qualifying residential fixed voice and broadband services. MTCC is a subsidiary from Mark Twain Rural Telephone Company, which covers the areas of Ewing, Lewistown, and La Belle with fixed voice and DSL Internet services. The census blocks that MTCC are responding to in the FCC Form 505 all fall in the Ewing, Lewistown, and La Belle service areas. MTCC hereby certifies that qualifying residential fixed voice and broadband services in the census blocks stated in the attached FCC Form 505 are served by MTCC. MTCC demonstrates that it can provide these census blocks with voice and broadband services that meet the Commission's performance and pricing criteria using the following attached evidence: Exhibit 1, page from MTCC's local tariff stating the areas the company serves; Exhibit 2, application for local service for the areas listed in the attached FCC Form 505; Exhibit 3, application for DSL Internet service for the areas listed in the attached FCC Form 505; Exhibit 4, copy of MTCC's CPNI filing.

In closing, Mark Twain Communications Company can provide fixed voice and broadband services that meet the Commission's requirements in all the census blocks included on the attached FCC Form 505.

Please contact me if you have any questions regarding our submission or require additional evidence.

Sincerely,

Jim Lyon
Exec. VP & General Manager
Mark Twain Rural Telephone Company
Mark Twain Communications Company
Mark Twain Long Distance, Inc.

Subsidiary of Mark Twain Rural Telephone Co.

P.O. Box 128, Hwy 6 E. Hurdland, MO 63547-0128 Phone: (660) 423-6822 Fax: (660) 423-5496

RECEIVED

PSC MO. NO. 1
Section 5
Original Sheet 1

APR 29 1998

APPLICATION

MO. PUBLIC SERVICE COMM

The rules and regulations specified herein apply to the intrastate services and facilities furnished by Mark Twain Communications Company, hereinafter referred to as the Telephone Company, or Company. Failure on the part of the subscribers to observe the rules and statutes of the Missouri Public Service Commission, after due notice of such failure, gives the Telephone Company the privilege to discontinue the furnishing of service.

In the event of a conflict between any rate, rule, regulation or provision contained within this tariff and any rule or statutes of the Missouri Public Service Commission, the rule or statutes of the Missouri Public Service Commission shall prevail.

This Tariff cancels and supersedes all other local tariffs of the Telephone Company issued and effective prior to the effective dates of this tariff.

Except as noted otherwise, this tariff applies to all exchanges of the Company.

The exchanges served by Mark Twain Communications Company are as follows:

Ewing
La Belle
Lewistown

FILED

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MISSOURI
Public Service Commission

Issued: April 29, 1998
Issued By:

Bill Rohde, General Manager
P.O. Box 128
Hurdland, Missouri 63547

Effective: June 13, 1998

JUL 28 1998



EXHIBIT 2

Date _____ Exchange _____
Applicant's Legal Name _____ Date of Birth _____ SSN _____
Spouse's Legal Name _____ Date of Birth _____ SSN _____
Non-Published # (Not available in D.A. or Phone Book) _____ \$1.00 (monthly)
Directory Listing _____ County _____
Billing Name _____ Billing Address _____
911 Address _____
Name of Employer _____ Employment Date _____
Name & Phone # of nearest relative _____
Do you have any disabilities (vision, hearing, speech or mobility) which may restrict you from accessing our services? _____ If so, please describe _____

PREVIOUS TELEPHONE SERVICE:

Name of Company _____ Telephone Number _____
Town _____ State _____ Date of disconnection _____

MONTHLY CHARGES FOR LOCAL SERVICE:

RESIDENTIAL LINE _____ \$11.25, BUSINESS LINE _____ \$18.75,

900 NUMBER BLOCK (No Charge) YES _____ NO _____

INTERNATIONAL CALL BLOCK (No Charge) YES _____ NO _____

INSIDE WIRE CONTRACT: YES _____ \$1.10 (Company will maintain wire and jack repair inside location)
NO _____ (Customer is responsible for inside wire and jack repair)

CUSTOMER CALLING FEATURES:

Call Forwarding _____ \$2.00, Call Waiting _____ \$2.00, 3-Way Calling _____ \$3.00, PIN Dialing _____ \$2.00,
8# Speed Dial _____ \$2.00, 30# Speed Dial _____ \$3.00, Auto Recall _____ \$2.00, Call Fwd/Busy _____ \$2.00,
Call Fwd/No Answer _____ \$2.00, Caller I.D.-Number _____ \$5.00, Caller I.D. Name & Number _____ \$6.00

Pkg A -- Call Forwarding, Call Waiting & 3-Way Calling _____ \$4.00

Pkg B -- Call Forwarding, Call Waiting, 3-Way Calling & Speed Calling (8#'s) _____ \$4.25

Other Options Are Available. Please See Our Brochure Or Contact Our Office.

Alarm & Security Systems Available; Call us today at 1-877-682-2835 for more information.

REMARKS _____

X _____ X _____
SIGNATURE OF APPLICANTS

NOTE: Application subject to credit check. Company reserves right to request a deposit and to add collection costs to all past due accounts.

MAP _____ LONG DISTANCE CARRIER _____ PIC FREEZE _____ NUMBER _____

Subsidiary of Mark Twain Rural Telephone Company

P.O. Box 128, Hwy 6 E. Hurdland, MO 63547 Phone: (660) 423-6822 Fax: (660) 423-5496

**Application for FastTrack DSL Internet Services**

Name _____

Date _____

Billing Address _____

Home Telephone # _____

Contact # _____

Whose name is the telephone number in? _____

Social Security # _____

Service Ordered / Account Information***Speeds Up To****1 Yr Term******Down / Up****Monthly Rate**

1.5M / 512k

☐ \$34.95

3.0M / 768k

☐ \$44.95

6.0M / 1.0M

☐ \$54.95

7.0M / 1.5M

☐ \$124.95

*Service availability depends on location. Some restrictions apply. Internet speeds may vary and are not guaranteed. At least one Mark Twain phone line is required for FastTrack DSL service.

Activation Fee – Installation Per Computer ☐ Company Installation \$65.00☐ *Subscriber will provide Wireless Router*☐ *Mark Twain will provide Wireless Router \$80.00 plus tax.*

The above rate for a wireless router does not include an additional \$8.50 if you want the wireless router shipped to you or \$20.00 if the wireless router is installed by a Mark Twain technician.

Modem: Furnished by Mark Twain. To be returned upon disconnection of service or charged \$75.00. Filters are required for all telephones, the first three (3) are free. Additional filters are \$7.50 each.

Agreement – By applying for services from Mark Twain Rural Telephone Company, you acknowledge that you have read and agree to be bound by all acceptable use policies and terms & conditions of service, as they may be amended and as posted on our web site. I agree that I will be responsible for any and all damages or loss to the equipment and that equipment will be returned immediately upon termination of this service or at anytime upon the request of Mark Twain Rural Telephone Company. I authorize Mark Twain Rural Telephone Company to investigate my credit in accordance with applicable law. I agree that Mark Twain Rural Telephone Company shall not be liable for any loss, damage or expense of any kind.

****12 Month Service Commitment** – Applicant agrees to maintain service for a period of 12 months from date of installation at the address listed above. You also agree to pay the remainder of the term, plus the Early Termination NRC amount (\$25.00) upon discontinuation of service for any reason, should service be discontinued or moved at any time prior to the completion of your 12 month commitment. Temporary Suspension Fee is (\$35.00), Max 6 months.

Authorized Signature _____ Date _____

NOTE: Company reserves right to request a deposit and to add collection costs to all past due accounts.

An Independent Telephone Cooperative

P.O. Box 68, Hwy 6 E. Hurdland, MO 63547 Phone: (660) 423-5215 Fax: (660) 423-5496



February 25, 2014

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, DC 20554

**RE: Annual CPNI Certification for 2013
EB-Docket No. 06-36**

Dear Ms. Dortch:

In accordance with the Public Notice, DA 06-223, issued by the Enforcement Bureau on January 30, 2006, Mark Twain Communications Company hereby files its most recent certification regarding its compliance with the rules of the Federal Communications Commission set forth in 47 C.F.R. Part 64, Subpart U.

If you have any questions, please feel free to contact me at 660-423-5211.

Sincerely,

Jim Lyon
Compliance Officer

cc: Best Copy and Printing, Inc. – via e-mail at fcc@bcpiweb.com

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 25, 2014

Name of company covered by this certification: Mark Twain Communications Company

Form 499 Filer ID: 803689

Name of signatory: Jim Lyon

Title of signatory: Compliance Officer

I, Jim Lyon, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification, as Exhibit 1, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Mark Twain Communications Company ("Mark Twain") does not use CPNI for marketing purposes. Accordingly, Mark Twain's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, Mark Twain has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to non-use of CPNI data.

Mark Twain has not taken any actions against data brokers in the past year regarding any breach of CPNI information.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Jim Lyon
Compliance Officer

Exhibit 1

Mark Twain Communications Company
Hwy 6, East
Hurdland, Missouri 63547

Accompanying Statement

Mark Twain Communications Company ("Company") maintains the following operating procedures to ensure compliance with the rules set forth in 47 C.F.R. Part 64, Subpart U:

A. CPNI Approval and Use

The Company does not currently solicit "opt out" or "opt in" customer approval for the use or disclosure of CPNI. The Company does not use CPNI for marketing purposes and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.

B. CPNI Training, Marketing Campaigns, and Supervisory Review

The Company has established CPNI compliance policies that include employee training on restrictions on the use and disclosure of CPNI and required safeguards to protect against unauthorized use or disclosure of CPNI. Employees understand the CPNI policies and a violation of those policies will result in disciplinary action.

The Company's CPNI policies require employees to obtain approval from the Company's CPNI Compliance Officer for all marketing campaigns prior to initiating that campaign. Record of all sales and marketing campaigns, along with the appropriate supervisory approval is maintained for at least one year.

The Company's CPNI policies and employee training include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.

C. Customer Access to CPNI

The Company's CPNI policies ensure that a customer is only able to access call detail information over the telephone in one of the ways listed in Rule 64.2010(b). If the customer cannot remember their password, they are prompted to answer a security question. Neither the password nor the security question are based on readily available biographical information or account information. Customer service representatives are instructed to authenticate customers over the telephone in all instances except in the case where the customer provides the call detail information without the assistance of the Company.

The Company's CPNI policies require customer authentication without the use of readily available biographical information or account information prior to initially gaining access to an account online. Once the customer is authenticated the customer is required to use a password to obtain online access to CPNI. The Company's CPNI policies allow the Company to disclose call detail CPNI to the customer at a retail location after presenting a valid photo ID that matches the customer's account information.

The Company's CPNI policies allow for a few ways to establish a password, all of which ensure compliance with the above paragraph. Each method also allows the customer to establish a back-up or security question in the event that they forget their password. In no event does the Company use readily available biographical information or account information as a back-up question or as a means to establish a password or authenticate the customer.

The Company's billing system generates a notification letter when any of the fields listed in Rule 64.2010(f) is created or changed. The Company immediately mails out the notification to the address of record (never a new address) when required by Rule 64.2010(f). The content of the notification complies with the requirements of Rule 64.2010(f).

The Company does not utilize the business customer exception at this time.

D. Law Enforcement Notification

The Company has policies and procedures in place to ensure compliance with Rule 64.2011. When it is reasonably determined that a breach has occurred, the CPNI Compliance Officer will notify law enforcement and its customer in the required timeframes. A record of the breach will be maintained for a minimum of two years and will include all information required by Rule 64.2011.